

ATTACHMENT II

WAIVER LETTER

To: GTE

This letter serves as authorization to allow (GTE Sales Entity) Personnel access to "Customer Proprietary Network Information: (CPNI) for identification of potential Enhanced Service applications for (customer name). CPNI, as defined by GTE includes, but is not limited to:

- Type and Quantity of Regulated Services Purchased
- Repair Information
- Traffic Studies
- SMDR Information
- Usage Data
- Customer Calling Patterns
- Forwarded to Numbers

Agreed to this date

(Customer Name)

By: _____

Title: _____



MARKETING NEWS

GTE Enters the Comparably Efficient Interconnection (CEI) Arena

August 18, 1991
Reference: 910299

Voice Messaging Services, first to fall into FCC Enhanced Services Regulatory Policy

GTE Telephone Operations, in concert with Federal Communications Commission (FCC) regulatory policy, has completed its implementation guidelines for providing CEI to Enhanced Service Providers (ESPs). This information currently pertains to IntraLATA Services, including Voice Messaging. The information in this announcement affects all Sales contact personnel that promote and/or sell network based Voice Messaging.

The following terms need to be defined before GTE's position on Comparably Efficient Interconnection/Open Network Architecture (CEI/ONA) can be fully explained.

Comparably Efficient Interconnection (CEI) -

CEI is a regulatory policy which directs the local exchange carrier to provide non-discriminatory safeguards and to offer equal competition to all providers of enhanced services.

Open Network Architecture (ONA) -

ONA is a regulatory policy which requires preconditions for the Regional Bell Operating Companies (RBOCs) to enter the enhanced services market without structural separation. The CEI policy will be in place until the ONA policy takes effect.

Enhanced Service Provider (ESP) -

An ESP is a vendor who provides enhanced services, including Voice Messaging. This vendor is our customer when they request CEI to GTE's central office. These enhanced services are computer processing based and are deregulated according to the FCC Computer Inquiry II Order.



Customer Proprietary Network Information (CPNI) -

CPNI is the private customer data related to the customer's basic network services accumulated by GTE in the course of furnishing common carrier services. This information is proprietary to GTE, unless the customer authorizes its release to an ESP.

The attached identifies the situations that may occur when GTE sales personnel are in contact with an outside ESP customer. If you have any question regarding the CEI/ONA regulatory policy call Product Sales Support at **1-800-FON-GTE4** or **1-800-FON-GTE5**. Their office hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. Calls received after these hours will be accepted via voice mail and returned as early as possible the next work day.

Author: Yvonne Cote

Publisher: Dawn Evans

Distributed to: Major Accounts Field Sales
TAM
General Business Field Sales
Application Specialists
CSAs

Background

In the earliest Computer Inquiry II Order, the FCC created two classes of service, basic and enhanced. Basic services were Public Network services over which the RBOCs exerted monopoly control, and did not involve computer processing. Enhanced services were deemed competitive and computer processing based. Basic services were regulated, and enhanced services were deregulated.

In 1985, the FCC decided that the enhanced service market was not developing rapidly enough. To resolve this issue it initiated the Computer Inquiry III proceeding, from which Open Network Architecture (ONA) was established. ONA is a regulatory policy which requires equal access to the Business Services underlying a Local Exchange Company (LEC) enhanced service offerings. ONA was created to encourage growth in the enhanced service market by permitting the RBOCs to enter the ESP market, but, with non-structural safeguards.

The non-structural safeguards stemmed from the FCC's recognition that ESPs may be competitors as well as customers. This could place the RBOCs at a competitive advantage by allowing the gathering of competitive information from an ESP's use of the Public Network. Moreover, further competitive advantage could be realized via proprietary cost and technical information.

The result was a "rule of thumb" that stated any competitive advantage an RBOC ESP could realize from an RBOC's operation of the Public Network should be neutralized. Thus, the Comparably Efficient Interconnection (CEI) and non-structural safeguard principles were born.

Safeguards

Non-structural separation safeguards are the regulatory rules the FCC developed to preclude RBOC discrimination. The RBOCs must provide equivalency in technical interconnection, service performance, pricing, ordering terms and conditions, provisioning, repair, billing services, customer information access, etc. The FCC believes these rules eliminate any possible competitive advantage the RBOCs might gain from their basic network business.

The FCC recognized that the ONA process may be a lengthy undertaking, and while debate on the RBOC plans continues, the enhanced service market cannot get the stimulation which RBOC entry would give this market. Consequently, the FCC permitted the RBOCs to offer enhanced services without structural separation by ordering them to file a CEI plan for each enhanced service they introduce until such time as their ONA plans are approved. At that point, the ONA plans will supersede existing CEI plans and negate the need to file any new ones.

GTE Concurrence

GTE now offers Voice Messaging Service to select customers in certain central offices (COs) in its franchised areas. Voice Messaging is a CO based, stored and forwarded, message delivery and receiving system. As such, it falls into a deregulated offering, competitive with ESPs. The result is a service offering that meets the previously mentioned "rule of thumb", requiring Comparably Efficient Interconnection (CEI) capability to any ESP also wishing to provide a like service.

CEI/ONA requires GTE to do business in a slightly different manner. To comply with the non-discrimination requirements of GTE's consent decree, the Voice Message Network Interconnection must be tariffed and made available for sale to ESPs requesting an interface to offer a competitive voice messaging system to GTE customers. The result is tariffed services to be made available to ESPs for the purpose of interconnection to GTE's network.

The Consent Decree requires GTE to implement the CEI/ONA safeguards which result in the need to restrict Customer Proprietary Network Information (CPNI). CPNI restriction prohibits GTE's Enhanced Services Sales personnel from viewing the customer records, eliminating the chance that GTE could obtain a competitive advantage from this information. Therefore, in each sales office there will be two types of sales representatives.

1. ESP Sales Representative

An ESP Sales Representative will sell CentraNet Voice Messaging by GTE and will sell ESP network interface services (addressed in the ESP Product Bulletin) to outside vendors providing enhanced services. The ESP representative cannot see restricted CPNI accounts.

2. Non-ESP Sales Representative

A non-ESP Sales Representative will sell all network services except enhanced services. Therefore, these representatives will not sell Voice Messaging.

This split will ensure the integrity of CPNI restriction.

CPNI

CPNI is the private customer data related to the customer's basic network services accumulated by GTE in the course of furnishing common carrier services. CPNI information includes:

- Type and Quantity of Regulated Services Purchased.
- Repair Information.
- Traffic Studies.
- Station Message Detail Recording (SMDR) Information.
- Usage Data.
- Customer Calling Patterns.

CPNI does not include:

- Customer Name.
- Customer Address.
- Customer Telephone Number.
- Unregulated Customer Services.
- Equipment Purchased.
- Credit Information.

*Note:
"forwarded-to" numbers added
after GTE introduction of
voice messaging*

Non-published and non-listed numbers are automatically restricted from outbound calling by a Sales Channel for the purpose of selling an enhanced service.

To meet GTE's requirements three different scenarios must be addressed that reflect the situations an enhanced services sales representative will encounter with the customer. They are:

1. The customer asks about CPNI restriction.
2. The customer asks to have their CPNI restricted.
3. The customer asks to have their CPNI unrestricted.

In each situation the sales representative may only take specific actions.

1. The customer asks about CPNI restriction.

If a customer asks about CPNI restriction, a letter has been developed explaining CPNI restriction that should be mailed to the customer. Appendix I contains a copy of the letter contents approved by the GTE legal department. No changes may be made to this letter. The letter should be printed on your local company letterhead.

2. The customer asks to have their CPNI restricted.

If a customer requests to restrict their account, they must be advised that a letter is required from them authorizing GTE to restrict their account from our Enhanced Service Sales Personnel. The Customer Service Representative (CSR)/Business Service Representative (BSR) or the account executive is responsible for explaining to the customer how their account will be handled in the future. Upon request to have CPNI restriction the following implications should be explained:

- When the customer calls the CSOC/BSOC, they will be transferred to a specific work group which does not sell Enhanced Services. This may cause additional waiting time for the customer.
- A call back may be necessary if the specific work group's lines are busy.
- GTE will be unable to keep the customer informed of future enhanced service offerings.
- CPNI restriction prohibits the customer's account from being viewed by GTE's Enhanced Sales/Marketing personnel.

Under no circumstances can any additional verbiage be used to persuade the customer to change their restrictions.

3. The customer asks to have their CPNI unrestricted.

If a customer asks to unrestrict the CPNI on their account they must be advised that a letter is required from them authorizing GTE to unrestrict their account. Once the letter is received, Enhanced Service Sales personnel can process their calls as usual.

ESPs

In addition to our usual customers, another customer may be making requests to Enhanced Services Sales - the Enhanced Service Provider. The Enhanced Service Provider is:

1. A separate entity wishing to purchase Basic Service Elements (BSEs) to provide an enhanced service to GTE customers.

OR

2. A large GTE customer wishing to purchase Basic Service Elements (BSEs) to use for their own enhanced service.

An information package will be provided for these type of customers. This package contains a technical description of the interconnection required for the central office in which the customer will be interfacing, the tariff for the Basic Service Elements, and a letter outlining what GTE will provide and how to order the interface. Please refer to the ESP Product Bulletin included in your copy of the package.

In addition to the information above, Telops Sales Training addresses CPNI as it relates to voice messaging service in the Voice Messaging course, number 4080. For more information on this course check your Voice Messaging Product Guide.

Explanation of Customer CPNI Restriction

In response to your inquiry, the following information explains the restriction of Customer Proprietary Network Information (CPNI) and how your account will be handled by GTE.

What is CPNI?

CPNI is the individual data that has been accumulated by the telephone company in the course of furnishing regulated common-carrier services to you. Information that GTE will treat as CPNI includes:

- Type and quantity of regulated services purchased (i.e., basic service, touch call, Custom Calling, etc.).
- Repair Information.
- Traffic Studies.
- Station Message Detail Recording Information.
- Usage Data.
- Calling Patterns.

Forwarded-to number and related information will be automatically restricted as CPNI, just like non-published numbers.

Information that GTE will not treat as CPNI includes:

- Customer name, address and telephone number (white pages information).
- Unregulated customer services and equipment (customer profile information such as CPE or enhanced services).
- Credit information.

What does restricting CPNI mean?

When you request that your CPNI be restricted it means any person within GTE who sells GTE's Enhanced Services, like voice messaging, is restricted from viewing your records. This may necessitate that your call cannot be processed by the first GTE Representative answering your call. If your CPNI is restricted, your call may need to be transferred to a Service Representative who is allowed to view your records.

Who may view your customer records?

Anyone within GTE who does not sell an Enhanced Service, like voice messaging, may view your records if you have elected to restrict it. This means that GTE personnel like repair and installation may view your records in order to provide you with timely, high quality services.

What must you do if you would like your CPNI restricted?

If you wish to have your CPNI restricted, you must send a written, signed request to the GTE Business Office. The request will be kept on file at the Business Office. If you wish to unrestrict your CPNI at a later date, you must send another written, signed request to the GTE Business Office.

The attached document was distributed to all GTE sales channels as a follow up to training on CEI/ONA.

This is an example of how the "refresher" information was distributed within the CSOC sales channel.

Date: 6-10-92 3:08pm
From: {K.ALTHANS}:TELEMAIL:GTEGO
To: R.GALLENSTEIN:TEL
Subj: CEI/ONA REVIEW FOR CSOC REPS

----- Telemail -----

Posted: Wed, Jun 10, 1992 4:00 PM EDT Msg: DGJC-4546-6088
From: K.ALTHANS
To: J.W.WYDOCK, K.WALL, L.CRUIZ, S.M.MILLER, C.TAGUE, C.WARCHOL
CC: K.ALTHANS, R.GALLENSTEIN, K.A.COX, S.HAGUE, J.K.COLE,
M.CARLYLE,
I.CIVEY, P.SHIMOMOTO, K.M.PIETROWIAK, B.D.NOVAK
Subj: CEI/ONA REVIEW FOR CSOC REPS

Your favorite subject and mine: CEI/ONA - CPNI
Requirements.

Previously, on 4/21 I asked for suggestions on how to follow-up and see how wonderful our training has been. A mystery caller was proposed, but this process will not cover enough of the bases. That is, we would like to insure all of the representatives has some refresher training on CPNI.

In order to review for all service representatives in an easy and quick process, the following questions and answers should be reviewed by the supervisors and their service representatives. The service representatives should fill in the answers on the question sheet and then review the questions with the right answers. These questions and answers are the same as the material in the original training package.

And guess what, the timeframe for completion is August 28th. This will give the areas who have just completed training a chance to complete the Q&A's later this summer.

This CEI/ONA review only needs to be completed in those CSOC's with Voice Messaging - Personal Secretary in place.

CEI/ONA REVIEW

COMMON CUSTOMER QUESTIONS AND ANSWERS

1) WHAT IS CPNI?

CPNI is the information held in GTE's customer records system which pertains to your regulated network services, such as, Basic Service, Touch Call, Custom Calling, repair

information, Calling information. This information basically makes up your monthly bill.

2) WHAT DOES RESTRICTING CPNI MEAN?

When you request that your CPNI be restricted it means any person within GTE who pro-actively sells GTE's enhanced services, such as Personal Secretary, cannot view your records.

3) HOW DOES THE RESTRICTION AFFECT MY SERVICE?

It does not affect your service, however it may affect GTE's ability to process your request efficiently and effectively. This may necessitate that your call cannot be processed by the first GTE Service Representative answering your call. That is, your call will have to be transferred to a specific group who may view your account or they may have to call you back.

4) WHO MAY VIEW MY ACCOUNT IF IT IS RESTRICTED?

Anyone within GTE who does not pro-actively sell an Enhanced Service, like Personal Secretary, may view your records. This means that GTE personnel like repair and installation may view your records in order to provide you with timely, high quality service.

5) HOW DO I OBTAIN INFORMATION REGARDING CPNI?

I will be glad to send you some information relative to CPNI restriction.

6) WHAT DO I DO IF I WOULD LIKE TO HAVE MY CPNI RESTRICTED?

If you would like to have your CPNI restricted, you must send a written signed request to the GTE business office. The request will be kept on file.

7) IS THERE A CHARGE TO RESTRICT MY ACCOUNT?

No, (there are no service order charges applicable).

8) WHAT IF I CHANGE MY MIND AND DO NOT WANT MY ACCOUNT RESTRICTED?

If you would like to unrestrict your account at a later date, you must send another written, signed request to the

GTE business office.

- 9) CAN I STILL ORDER AN ENHANCED SERVICE IF I RESTRICT MY ACCOUNT?

Yes, the service representative can take your order.

- 10) WHY IS GTE DOING THIS?

GTE, is following guidelines established with the FCC/State Regulatory Commissions to allow GTE to sell enhanced services.

- 11) CAN AN ENHANCED SERVICE PROVIDER REQUEST CPNI RESTRICTION FOR THEIR CUSTOMERS?

No, all requests for CPNI restriction must be a written signed request by the customer only, NOT by the Enhanced Service Provider.

- 12) WHAT IS AN ENHANCED SERVICE PROVIDER?

An Enhanced Service Provider (ESP) is a provider of an enhanced service, such as Voice Messaging.

- 13) WHAT OTHER PRODUCTS ARE ENHANCED SERVICES?

Voice Messaging is the first enhanced service GTE is offering. Other services include Packed Switch Services, Circuit Switched Line, Dedicated Video and many others to come.

- 14) WHAT IF I HAVE A NON-PUBLISHED OR NON-LISTED NUMBER?

Non-published and non-listed numbers are a special class of CPNI restriction and are automatically restricted from outbound calling by any enhanced service sales. (This means, no change in our current business procedures relative to NP and NL numbers.)

ATTACHMENT Q

GTE BUSINESS CUSTOMER EXPECTATIONS STUDY

**A Report on Phase I of Research
to Identify the Needs and Expectations
of the Business Market**

Prepared for:

GTE CORPORATION

By:

**OPINION RESEARCH CORPORATION
P. O. Box 183
Princeton, New Jersey**

January 1990

ORC Study #33737

**D. Specific Attributes That Drive Loyalty and How
They Vary by Product/Service Needs**

- Sales
- Service Support (I&R)
- Billing

SALES

Customer Rankings of Specific Sales Attributes

Based on the in-depth customer interviews, business customers appear to set the following priority on specific aspects of their expectations of a communications provider in the area of sales.

First Tier:

- ♦ Being represented by people who are knowledgeable of products and services
- ♦ Being responsive in meeting needs and solving problems

Second Tier:

- ♦ Being represented by people who are really interested in the needs and problems of the customer's company
- ♦ Providing a single point of contact
- ♦ Providing a contact who is knowledgeable about the customer's business

Third Tier:

- ♦ Keeping the customer informed of new products and services
- ♦ Offering innovative products and services
- ♦ Offering competitive prices

Key Sales Attributes as Perceived by GTE Employees

In the eyes of GTE employees, overall sales evaluations are heavily dependent on the vendor's willingness to take overall account responsibility, on a cross-functional basis. The ability to make recommendations that directly address customer needs and serve as a consultant to the customer is dependent on the salesperson's knowledge about the customer's business and the options available to him. This ability to function as an advisor is also critical to overall evaluations.

Employees feel that, more than in any other area, customers focus on personal handholding in overall evaluations of sales. Customers may place an even greater emphasis than previously on the ability of the salesperson to help him sort through options and new technology. Honesty, knowledge, commitment, advocacy, and the ability to demonstrate how products and services meet customer needs seem, to employees, to overshadow product availability or pricing concerns often associated with overall sales.

ATTACHMENT R

Listed following are the ongoing reports and information that must be provided by the BOCs:

ONA User Guide

Quarterly ONA report on installation and maintenance

Annual projected deployment schedules for ONA services

New ONA service requests from ESPs

ONA service requests previously deemed technically infeasible

SS7, ISDN, and IN projected deployment

New ONA services available through SS7, ISDN and IN

Progress on IILC efforts on continuing activities for the implementation of service-specific and long-term uniformity issues

Progress in providing billing information

Billing Name and Address (BNA)

Line-side Calling Number Identification (CNI)

Automatic Number Identification (ANI) and Call Detail

Progress in developing and implementing Operations Support Systems (OSS) services

Progress on the uniform provision of OSS services

BSEs used in the provision of [GTE] enhanced services

